

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

KELLY DAWSEY,

Plaintiff,

V.

C.A. No. 7:22-cv-03738-TMC-KFM

BAYERISCHE MOTOREN WORKE
AKTIENGESSELLSCHAFT and BMW
MANUFACTURING CO., LLC collectively
d/b/a “BMW GROUP,”

Defendants.

DEFENDANT BMW MANUFACTURING CO., LLC's
SUPPLEMENTAL RESPONSES TO LOCAL RULE 26.03 INTERROGATORIES

Pursuant to Local Rule 26.03, Defendant, BMW Manufacturing Co., LLC (“BMW MC”),
by and through its undersigned counsel, makes the following supplemental disclosures.

1. The Names of Fact Witnesses Likely to be Called by the Party and a Brief Summary of Their Expected Testimony.

BMW MC anticipates that they will call one or more of the following individuals as fact witnesses:

a. Plaintiff Kelly Dawsey

Plaintiff is expected to testify regarding the allegations she has made in the Complaint in this matter.

b. Christine Petrasch

Christine Petrasch previously served as Vice President of Human Resources at BMW MC and is knowledgeable about Plaintiff's employment, the reorganization of the HR Department, and her communications with Plaintiff regarding the reorganization and her new role in the Department. She would be expected to testify regarding the same.

c. Sherry McCraw

Sherry McCraw is the current Vice President of the Human Resources Department at BMW MC. Ms. McCraw is knowledgeable about Plaintiff's employment, the reorganization of the HR Department, and her communications with Plaintiff regarding the reorganization and her new role in the Department. She would be expected to testify regarding the same.

d. Eva Burgmeier

Eva Burgmeier is a manager in the Human Resources Department at BMW MC. Ms. Burgmeier is knowledgeable about her employment at BMW MC, the grading of positions at BMW MC, and the organization of the HR Department. She would be expected to testify regarding the same.

e. Scott Medley

Scott Medley is a manager in the Human Resources Department at BMW MC. He is knowledgeable about Plaintiff's employment at BMW MC, the grading of positions at BMW MC, the organization of the HR Department, and communications related to the reorganization of the HR Department. He is expected to testify regarding the same.

f. Corey Epps

Corey Epps is a manager in the Human Resources Department at BMW MC. He is knowledgeable about Plaintiff's employment at BMW MC, his employment history at BMW MC, the organization of the HR Department, and communications related to the reorganization of the HR Department. He is expected to testify regarding the same.

g. Kathy Keiser

Kathy Keiser is a manager in the Human Resources Department at BMW MC. She is knowledgeable about Plaintiff's employment at BMW MC, her employment history at BMW MC, the organization of the HR Department, the operation of the TX-60 department under Plaintiff's management, and communications related to the reorganization of the HR Department. She would be expected to testify regarding the same.

h. Dr. Robert Engelhorn

Dr. Robert Engelhorn is the current President and Chief Executive Officer of BMW MC. Dr. Engelhorn is knowledgeable about the reorganization of the HR Department at BMW MC, his communications with other members of BMW management regarding such reorganization, and his communications with Plaintiff regarding her resignation. He would be expected to testify regarding the same.

i. Sherrill Miller

Sherrill Miller, who previously worked as a recruiter at Morse & Savage, has knowledge regarding her efforts to find Plaintiff another job in the fall of 2021, and her communications with Plaintiff related to the job search. She would be expected to testify regarding the same.

BMW MC anticipates that there will be additional fact witnesses identified during discovery. BMW MC reserves the right to supplement its response to this inquiry in the course of discovery and to call as witnesses at trial any individuals deposed or identified by Plaintiff or BMW MC in other disclosures, discovery responses, or document production.

2. **The Names and Subject Matter of Expert Witnesses. (If no witnesses have been identified, the subject matter and field of expertise should be given as to experts likely to be offered.)**

Zachary H. Mueller, CPA/ABV/CFF, CVA, CFE
GreerWalker LLP

Mr. Mueller is expected to offer testimony on Plaintiff's claimed economic damages.

Respectfully submitted this 24th day of August, 2023.

s/ Ellison F. McCoy

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